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January 27, 2025

**VIA ECF**

Attention: The Honorable André M. Espinosa, U.S.M.J.  
United States District Court  
District of New Jersey-Newark Vicinage  
50 Walnut Street, Room 2037  
Newark, New Jersey 07101

**RE: Robert Ayariga v. Pride Express Transportation, Inc., et al.**  
**Docket No.: 22-cv-07278(WMJ)**

Dear Honorable Judge Espinosa:

Please be advised that the undersigned represents Defendants, Pride Express Transportation, Inc. and Franklin L. Cerrato-Carvajal (“Defendants”), in the above-referenced matter. This matter has a telephonic Status Conference scheduled for January 30, 2025. At the order of this Court, Defendants submit the within Joint Discovery Status Letter prior to status conference to address outstanding discovery and a request for an extension of the discovery end date.

By way of update, please be advised that Parties have exchanged discovery responses. records. On June 24, 2024, Defendants sent HIPAA authorizations to Plaintiff to execute. As Plaintiff is alleging a permanent injury, it is imperative that we obtain his medical records to assess his damages and have an expert conduct an independent medical examination. Plaintiff’s independent medical examination has been scheduled for September 25, 2024, Dr. Joseph Dryer’s first date of availability. The IME was rescheduled to November 27, 2024 because Plaintiff failed to show up to the original appointment. Defendants are waiting for Dr. Dryer’s expert report as there have been delays due to issues with MRI films. The films were hand delivered to the doctor on January 23, 2025. Defendants will need additional time to serve the report on Plaintiff. Additionally, we need updated information on any workers compensation liens.

We respectfully request additional time to obtain the outstanding expert report. The extension will not cause any undue delay in this matter and will ensure that critical fact and expert discovery will be completed. Defendants’ have reached out to Plaintiff’s counsel to engage in

settlement discussions. We also reached out to Plaintiff's counsel for a response on this joint status letter and received no response.

We appreciate Your Honor's consideration and courtesies in this matter.

Respectfully submitted,  
**CIPRIANI & WERNER, P.C.**

*lsl Robert F. Ball*

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**ROBERT F. BALL, ESQUIRE**

RFB/mav (w/encl.)

cc: Nicholas P. Scutari, Esq. (via ecf)